

EXHIBIT 4

1

Pages: 1-87

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

DOCKET NO. H1:04-CV-11938

WILLIAM STEVENS *

Plaintiff *

vs. *

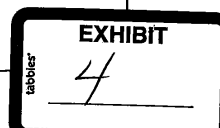
MASSACHUSETTS DEPARTMENT OF *

CORRECTION, ET AL *

Defendants *

DEPOSITION of WILLIAM STEVENS, a Witness called
by the Defendants, taken pursuant to the provisions of
the Federal Rules of Civil Procedure, before Peter J.
Wood, a Professional Court Reporter and Notary Public
in and for the Commonwealth of Massachusetts, at the
Massachusetts Treatment Center, Bridgewater,
Massachusetts, on Wednesday, February 1, 2006,
commencing at 10:25 a.m.

WOOD COURT & CONFERENCE REPORTING
77 SUMMER STREET
COHASSET, MA 02025
(781) 383-6621



A P P E A R A N C E S

William Stevens, Plaintiff, Pro Se

DEPARTMENT OF CORRECTION

(By Richard McFarland, Esq.)

70 Franklin Street

Boston, Massachusetts 02110

(617) 727-3300

On behalf of the Defendants

WOOD COURT & CONFERENCE REPORTING

I N D E X

WITNESS

WILLIAM STEVENS

Examination by Mr. McFarland

4

E X H I B I T S

NO.	DESCRIPTION	
1	Wicca Handbook	62
2	Letter dated 4/9/04	62
3	Purchase Request dated 5/7/04	64
4	Purchase Request dated 11/1/04	65
5	Letter dated 1/18/05	67
6	Schedule	73
7	Schedule	74
8	Book Checkout Log	78
9	Certificate of Ministry	83

WOOD COURT & CONFERENCE REPORTING

1 Q At some point, did you move to Massachusetts?

2 A Yes.

3 Q When was that?

4 A That would have been in the mid '90s, mid to late
5 '90s.

6 Q Where did you live in Massachusetts?

7 A Harwichport.

8 Q Did you have a job there?

9 A Yes.

10 Q Is that why you came, for the job?

11 A No. I was adopted as a child. I found my birth
12 mother who lived on the Cape. She was terminally
13 ill, and I moved down to the Cape to assist her.

14 Q That was Harwichport, you said?

15 A Yes.

16 Q You lived there until the conviction of your
17 crime?

18 A Yes, sir.

19 Q While you were in Harwichport, did you practice
20 the Wiccan religion?

21 A The Wiccan religion is more of a lifestyle than a
22 religion, but yes, I did partake in some

1 religious ceremonies while I lived in
2 Harwichport, yes.

3 Q What kind of ceremony did you partake in?

4 A The Sabbat ceremonies. I occasionally would go
5 back to the Kentucky area where I lived prior to
6 coming to the Cape and would attend Sabbat
7 celebrations there, not all of them but a few.

8 Q Did they have the same ceremony in Massachusetts
9 on the Cape?

10 A I believe there's probably Wiccan covens on the
11 Cape, but I'm not aware of any particular.

12 Q You didn't meet with any of the covens when you
13 were living in Harwichport?

14 A No.

15 Q So how would you practice your religion aside
16 from going to the Sabbats in Kentucky?

17 A Daily meditations which are pretty much the
18 Wiccan equivalent of prayer in the mainstream
19 religions. On the Sabbats that I didn't go back
20 down to Kentucky, I would try and do something
21 personally showing my respect for that particular
22 religious holiday.

1 Q What would that be?

2 A It usually would involve an extended meditation
3 period concentrating on the particulars of the
4 Sabbat which would be Yule when the god in our
5 religion is born, and taking a portion of
6 whatever meal I prepared for myself subsequent to
7 and offering that to the gods and goddesses, an
8 offering, basically.

9 Q So when you would go to the Sabbat in Kentucky,
10 how often do they take place, the Sabbats?

11 A Oh, about every month and a half, basically, and
12 I probably attended three over a two-year period.
13 It's a little expensive getting back.

14 Q Do you drive there?

15 A Yes.

16 Q What happens at these Sabbats in Kentucky that
17 you attended?

18 A Generally, the Sabbat will take place over a two
19 to three-day period surrounding the actual date
20 of the Sabbat, and it's just where people of the
21 same religious beliefs get together and praise
22 our gods and goddesses. It's a lot of energy.

1 ran the program there.

2 Q Does Gardner similarly have a dual population
3 where they have to have two separate groups?

4 A Negative.

5 Q So Gardner had just one group of Wiccans, and
6 they were all able to meet together?

7 A Correct.

8 Q The two Wiccan groups, the state and the civil
9 inmates, do they meet on any occasions?

10 A State and civil in this facility?

11 Q Yes.

12 A No. There is a separate order that's been issued
13 by the courts.

14 Q So they never have anything to do with each
15 other?

16 A Not in theory, no.

17 Q Presently, how often do you meet the civil
18 Wiccans at the Treatment Center?

19 A Civil Wiccans are allowed to meet two times per
20 week.

21 Q What are the hours?

22 A The hours are 7:00 to 8:40 Wednesday night, and

1 Friday night, the hours are frequently shorter
2 than that due to delayed movements.

3 Q Do the state Wiccans have a similar amount of
4 time period for their services?

5 A I believe so, yes.

6 Q Tell me what happens when you meet twice a week
7 at the Treatment Center for your Wiccan group.

8 A At the Treatment Center, I've been instructed by
9 the Deputy Director Murphy that I was no longer
10 -- I was not allowed by DOC policy to lead
11 religious celebrations for other inmates, so I
12 attempted to educate the inmates that are
13 interested in Wicca in basic fundamentals of the
14 Wiccan religion using teaching guides set up by
15 another coven in the area.

16 Q What coven is that?

17 A That would be Our Lady of Enchantment out of New
18 Hampshire. She's moved to California now. This
19 is the organization. This is the teaching
20 materials.

21 Q Now, was this woman ever a volunteer here?

22 A No. I've asked the director of treatment on

1 several occasions to contact local agencies to
2 find outside volunteers for us, and apparently
3 they've had no success thus far in their
4 endeavors.

5 Q Do you have any contact with people in the Wiccan
6 covens outside of the prison?

7 A Not locally. They'd be like Kentucky would be
8 the closest.

9 Q Are there ways for you to find out who are the
10 local covens in the state?

11 A Not conveniently. I mean, I could probably write
12 to somebody in the streets and have them do an
13 internet search, that type of thing.

14 Q Did you have a volunteer when you were at the
15 NCCI prison?

16 A No. At the NCCI prison, I was allowed to lead
17 Wiccan service and prayer.

18 Q But there was no Wiccan volunteer that came in to
19 instruct you or others?

20 A No.

21 Q This policy was stopped because DOC does not
22 allow inmates to lead other inmates?

1 A That was the letter that I received which I
2 believe I attached as part of the discovery
3 request. I'm not sure.

4 Q So you have been at the Treatment Center since
5 January of '04?

6 A Correct.

7 Q About two years?

8 A About two years, yes.

9 Q Have you made any attempts to locate a volunteer
10 from the community to come in and lead services
11 for the Wiccans?

12 A As I said, I gave the director of treatment the
13 telephone numbers of two nationally-recognized
14 groups and asked that contact be made of these
15 people, and as far as I know, this has never been
16 done, contact was never made. I don't know
17 whether they followed through or not.

18 Q Who are these groups you gave them the names of?

19 A One is Circle Sanctuary, again out of Mount
20 Hoerab, Wisconsin. They've got a prison outreach
21 network. I asked that they be contacted. Off
22 the top of my head, I can't remember the name of

1 the other organization.

2 Q Do you recall where it was, the location?

3 A It was local. It was the New England area.

4 Q You gave them the addresses?

5 A Telephone numbers and addresses, if I'm not
6 mistaken.

7 Q You were not able to write them a letter to ask
8 them on your own?

9 A No. I assume that the information provided to
10 the director of treatment would be in much more
11 capable hands than if I send it out, it's got a
12 stamp across the back that says this came from a
13 prison. Most people look at that and are
14 somewhat shocked, and it's been my experience
15 that they usually dispose of it without even
16 bothering to read it.

17 Q But you are looking for them to come into a
18 prison to be a volunteer?

19 A This is true, but I feel that it would be more
20 effective if an administrator from the prison
21 said I'm Mr. So and So in such and such a
22 position at this facility, would it be possible

1 for you could come in and lead Wiccan practice as
2 opposed to I'm a prisoner here, and we need
3 somebody to come in and lead our Wiccan
4 ceremonies. I just believe that the presentation
5 would be more readily accepted if it came from an
6 administrator of the prison.

7 Q So, then, you're content to wait and see what
8 happens with the administration?

9 A I was under the impression that the
10 administration would comply with the CMR in an
11 attempt to bring somebody in, and they haven't,
12 so I've been content to wait for the outcome of
13 this action here before I take any further steps.

14 Q So a lawsuit which could take three or four years
15 is preferable than you picking up pen and paper
16 and writing to the Circle Sanctuary in Wisconsin;
17 is that fair to say?

18 A No. Like I said, I believe it's fair to say that
19 I think a request from the DOC would be more
20 readily accepted than a letter by an inmate
21 coming through the inmate mail. In the past when
22 I was at Gardner, I attempted to make contact

1 with various organizations and found that the
2 mail that was sent with the inmate stamp across
3 the back of it was usually ignored.

4 Q Because you got no response?

5 A Correct.

6 Q So you're assuming it was ignored because you got
7 no response?

8 A Yes, correct.

9 Q On how many occasions did you send out letters to
10 other covens or Wiccan agencies to try and get a
11 volunteer into NCCI--Gardner?

12 A We sent mailings of 20 pieces out on at least two
13 occasions in Gardner.

14 Q No response to any of those mailings?

15 A No.

16 Q Could you describe for me what takes place when
17 the Wiccans meet, the civil Wiccans meet, at the
18 Treatment Center?

19 A At the Treatment Center, the civil Wiccan
20 meetings are comprised of, as I said, the basic
21 education, principles, and practices of our
22 religion as espoused by Lady Sabrina. They, on

1 Sabbats, have been allowed to get cake and juice.
2 I don't know who the original person was who
3 requested the cake and juice. Cake and juice is,
4 I'm assuming, taking the place of a cakes and ale
5 ceremony which is usually the secondary
6 celebration of the Sabbats.

7 Q So when you have these eight Sabbats, those take
8 place at the normal scheduled time for the Wiccan
9 groups to meet?

10 A Yes. Those times don't always fall in with the
11 dates of the Sabbats, but I have attempted at
12 this facility to work with the administration and
13 not push our schedule into theirs. I know
14 there's the timing issues with the use of the
15 building, and I've always been willing to
16 accommodate the DOC on our nights that Sabbat was
17 celebrated.

18 Q So if there's not a Sabbat being celebrated, if
19 you can take me through from the moment you walk
20 into the room of the Wiccans, what happens from
21 the beginning?

22 A In this facility?

1 Q In this facility.

2 A Walk in the door. It's usually followed by
3 bringing the others in the group up to speed on
4 what's been going on in your life, problems.

5 Q So you sit around on chairs?

6 A When chairs are available. They frequently are
7 not available in the room we're allowed to use.

8 Q If they're not available, do you stand in a
9 circle?

10 A Stand in a circle, sit on the floor.

11 Q Each person describes what's going on in their
12 life?

13 A Well, let's say, for instance, getting ready to
14 come here and be deposed today, I'll talk about
15 it tonight at the Wiccan meeting, tell the guys,
16 you know, kind of how I felt, how it affected me
17 emotionally, my thoughts on the whole process,
18 just open up to the group. It's kind of making
19 many individuals into one.

20 Q So each individual in the group can then speak
21 out and say what they want to say about what's
22 happening to them?

1 A Right.

2 Q Does that go on for five or ten minutes,
3 normally?

4 A Yeah, five or ten minutes usually.

5 Q Then what happens next in the ceremony?

6 A I'll show a video if we have one and a TV
7 available, educational video. We'll work through
8 the Ray Buckland's Complete Book of Witchcraft,
9 or we'll deal with the information provided by
10 the Lady of Enchantment, lessons.

11 Q So you will bring in a TV set and you'll show a
12 video?

13 A Right, if there is a TV available.

14 Q If it's not available, why would that be?

15 A Because I can't track it down, usually.

16 Q Someone else may have the TV set?

17 A Yeah. There's one TV that's made available for
18 all the groups, and frequently, it's been
19 someplace other than the religious closet.

20 Q So if the TV set's there, you bring it down to
21 the room, and you show a videotape.

22 A Right.

1 Q Is it like a half-hour videotape?

2 A Half an hour to an hour. I think they average
3 about a hundred minutes.

4 Q Those tapes, do they basically kind of talk about
5 Wiccans?

6 A Yeah. They're very basic educational videos.

7 Q Then after the video is over, you would then go
8 through the books you have for Wiccans?

9 A Yeah, discuss what we've seen in the video, go
10 through one of the books. I try to answer what
11 questions I can. If I can't answer it, I'll
12 attempt to research an answer for the people
13 involved.

14 Q Are you the most knowledgeable person regarding
15 Wiccans in the coven here?

16 A At this time, yes.

17 Q In the book, will you read passages and try and
18 relate those to people's daily lives?

19 A No, not particularly. Simple things like candles
20 are frequently used in Wiccan religious practice.
21 When you buy a candle from the store, it's got
22 the energy of pretty much everybody who's touched

1 the candle from the making to the packaging to
2 the storing and displaying at the store, so you'd
3 want to take the candle that you're going to use
4 for religious workings and do what we call
5 dressing the candle, taking a cleansing oil, and
6 there's a proper method for anointing a candle
7 prior to use, something as simple as teaching
8 them how to do that, or going through the
9 correspondences in the books and explaining why
10 if you're doing a spell for money, let's say, a
11 green candle would be the appropriate color
12 because most people associate green with the
13 color of money.

14 Q Now, would you light the candles as part of the
15 daily ceremony or the weekly ceremony?

16 A In Gardner, we used candles during meditation as
17 something to focus on to clear your mind. We
18 also used candles during the Sabbat celebration.
19 They were lit.

20 Q So you use the candles in the regular service,
21 not the Sabbat if you're meditating?

22 A We also use them during the Sabbat celebrations,

1 yes.

2 Q Just getting back to the non-Sabbat celebration,
3 if you're meeting on Tuesday evening for your
4 services, at what point would you use a candle
5 for meditation, toward the end of the ceremony,
6 the middle of the ceremony?

7 A We'd be using the candle for meditation. I can
8 only describe the way we would do it in Gardner.
9 Of course, everybody would get into the room.
10 We'd spend the 10, 15 minutes kind of discussing
11 what's going on, clearing -- you know, getting
12 our minds kind of centered on what we're going to
13 do, and we'd set up the candles usually on a
14 slightly elevated platform, a small table in the
15 middle of the room.

16 The Wiccans would sit around the
17 candles in a circle on a pallet mat or a cushion,
18 whatever, and then focus on the candles and
19 meditate for anywhere from 15 to 30 minutes.
20 Usually the person leading the meditation can I
21 guess you'd call it read the room, and you pretty
22 much know when people are starting to get

1 uncomfortable and moving around. That's time to
2 start winding the meditation down.

3 Q Does the meditation take place on every Wiccan
4 ceremony except when you have the Sabbats?

5 A I personally believe that the Wiccans that I've
6 associated with in the past use meditation on a
7 daily basis, whether you do that in your home or
8 in your coven. Group meditation has historically
9 been more effective than individual meditation.
10 Something about getting everybody's mind cleared
11 and centered on what you're doing just seems to
12 be more -- happen more easily during group
13 meditation.

14 Q So that seems to be one of the parts of the
15 weekly ceremonies?

16 A Correct.

17 Q That takes place towards the end of the ceremony?

18 A Usually closer to the beginning but not
19 immediately. Like I said, we do meet and greet,
20 for lack of a better word, and get everybody kind
21 of calmed down before you start meditation,
22 become acclimated to the room.

1 Q Then you would show the videotape after you
2 finish your meditation?

3 A Correct.

4 Q Now, do you meditate just once per ceremony, or
5 do you do it a couple of times?

6 A Usually, it's just the single meditation.

7 Q Then after you've done the meditation and the
8 video and you've worked through the book, what
9 happens next?

10 A Usually, we've got some CDs with music by Wiccan
11 groups or groups that identify themselves as
12 Wiccan, and usually we turn that on, background
13 noise, and just talk, fellowship, basically.

14 Q You engage in fellowship, talking together as
15 members?

16 A Correct.

17 Q There's no lecture or sermon or anything else
18 that's provided?

19 A I've been told by the DOC that I'm not allowed to
20 do sermons anymore.

21 Q In the past, were you able to do sermons?

22 A Was I able to lead Wiccan religious meetings,

1 yes, I was. We don't call them sermons.

2 Q When you did lead Wiccan services, what did that
3 entail?

4 A Usually, you set up an altar in the center of the
5 room. You'd place your tools on the altar, tools
6 being two candles, right and left, one for the
7 god, one for the goddess, a statue of the god and
8 the goddess to compliment the candles, a working
9 candle directly across from the person leading
10 the ceremony on the altar.

11 The center of the altar usually they
12 have a pentagram to the right and the left.
13 You'd have water and salt in front of the altar.
14 That's where you'd keep your Book of Shadows
15 which is the Wiccan's equivalent of, say, the
16 Christian Bible, only you're required to write it
17 yourself.

18 Q You mentioned an altar. Is there an altar as
19 part of your services here at the Treatment
20 Center?

21 A After considerable effort, they did allow me to
22 build an altar for the Wiccan group in this

1 facility, and then they put the altar in the
2 Christian chapel which is not where we meet and
3 gave me no way to get the altar into the room
4 that the Wiccans are allowed to use for religious
5 services, so we have an altar, but we can't use
6 it.

7 Q Can the inmate Wiccans use the altar?

8 A No. I don't believe they meet in the chapel,
9 either.

10 Q Do you use anything else besides the altar, then,
11 in your meetings?

12 A Here or in Gardner?

13 Q At the Treatment Center.

14 A We have a small altar cloth. When we wanted to
15 use a chalice or a bowl, we usually brought
16 things from the cell to use on the altar.

17 Q So you'd bring a footlocker or something?

18 A No. I'll bring a plastic bowl that they sold in
19 the canteen for mixing the water and salt
20 together to sprinkle around the room as a
21 cleansing ritual.

22 Q So in your weekly services, you tend not to use

1 an altar-like structure?

2 A You've lost me.

3 Q You don't have access to the altar that was built
4 out of wood?

5 A Correct.

6 Q But you now use a plastic bowl covered with an
7 altar cloth as your altar; is that what happens
8 in your services now?

9 A No. I will set the altar cloth on whatever we
10 have available. There's a footstool that they've
11 got down there now, set the altar cloth on top of
12 that, and place what bowls we have on top of
13 that.

14 Q You said the plastic bowl contains salt?

15 A Salt and water, one in each, and you usually mix
16 them together and use that as the agent with
17 which to consecrate the space you're using.

18 Q Is that done at the beginning of the ceremony or
19 at the end?

20 A Yes, the beginning.

21 Q What else is done in the ceremony?

22 A After cleansing the room, you cast what we call